

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF OKLAHOMA**

VANCE DOTSON,

Plaintiff,

v.

CREDIT COLLECTION SERVICES,

Defendant.

Case No. 5:22-cv-0255-G

DEFENDANT'S MOTION TO DISMISS

Defendant, Credit Control Services, Inc., d/b/a Credit Collection Services, improperly named as Credit Collection Services, respectfully moves to dismiss this action with prejudice pursuant to Fed. R. Civ. P. 12(b)(6). Plaintiff Dotson's attempt to take assignment of a cause of action under the Fair Debt Collection Practices Act, 15 U.S.C. § 1692 *et seq.*, is invalid under Oklahoma law and contrary to public policy such that the claim must be dismissed.

In support, CCS refers the Court to the accompanying Memorandum of Law in Support of Motion to Dismiss, any Response and Reply thereto as well as all the pleadings in this matter. CCS respectfully requests that the action be dismissed with prejudice and prays for its

fees and costs as well as such other and further relief that the Court may deem just and equitable.

April 20, 2022.

Respectfully submitted,

**GORDON REES
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/s/ Robert A. Bragalone

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**ATTORNEYS FOR DEFENDANT CREDIT
CONTROL SERVICES, INC., d/b/a
CREDIT COLLECTION SERVICES**

CERTIFICATE OF SERVICE

I hereby certify that all counsel of record who are deemed to have consented to electronic service are being served on April 20, 2022, with a copy of this document via the Court's CM/ECF system per Local Rule CV-5. Any other counsel of record or unrepresented party will be served by electronic mail, and/or first class mail on this same date.

Vance Dotson

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/s/ Robert A. Bragalone
Robert A. Bragalone